

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
WRKI RADIO STATION
BROOKFIELD, CONNECTICUT
August 2008

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of WRKI, Channel 236B, Brookfield, Connecticut. Cumulus is submitting a minor change application for WRKI; as such, a Radio Market Analysis is necessary. Cumulus is also the licensee of WDBY, Channel 288A, Patterson, New York and WINE, 940 kHz, Brookfield, Connecticut. WRKI and WINE are licensed to communities within a metro county in the Danbury, Connecticut Arbitron Market (being located in Fairfield County, Connecticut). WDBY is considered "home" to the Danbury market, but is also a metro station in the New York Arbitron Market. As discussed in greater detail below, Fairfield County is divided into several parts or "splits". The entire county is not considered in any one market, but is divided into four markets: New York, Stamford-Norwalk, Bridgeport and Danbury. The portion of Fairfield County designated as "Fairfield (SN Split)" is considered the Stamford-Norwalk market. The Fairfield (SN Split) is an embedded market and also considered part of the New York Metro market as well.

2. As reflected in Exhibit #1, Arbitron only considers those portions of Fairfield County indicated as "Fairfield (SN Split) Balance" and "Fairfield (SN Split) HDHA", not the entire Fairfield County area, as being in the New York market. Exhibit #1B, which is a portion of the

2008 Arbitron Radio Metros map (based on the Fall 2007 survey)¹, shows that only the portion of Fairfield County, Connecticut depicted as "SN Split" is located within the confines of the New York, New York Market. The balance of the county is divided up into Fairfield (D split) for the Danbury, Connecticut market (Exhibit #1C) and Fairfield (BR split) for the Bridgeport, Connecticut market (Exhibit #1D). Only the Stamford-Norwalk, Connecticut market shares the Fairfield (SN split) designation (Exhibit #1E). As such, only Stamford-Norwalk stations are considered embedded in the New York, New York market.² Therefore, only stations in New York or those in Fairfield (SN split) are considered metro stations in the New York, New York market. Therefore, WRKI is not considered part of the larger New York Arbitron market.

3. In the Danbury, Connecticut market, Cumulus controls two FM stations and one AM station in the market (WRKI, WDBY and WINE). As indicated on Exhibit #2, the Danbury, Connecticut market contains a total of nine stations. The number of stations indicated falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the subject market. Therefore, Cumulus is in compliance in the rated Danbury, Connecticut market and the minor change for WRKI is compliance with the ownership rules.

1) This is the most current map available from the Arbitron website.

2) Arbitron also has two additional embedded markets within the New York market, Nassau-Suffolk and Hamptons-Riverhead. In these two additional markets, the metro county, or portion of the county, is also shared by the larger encompassing market.

4. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2. BIA database. Technical data related to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

MARKET DEFINITIONS FOR ARBITRON SURVEYS

To see the Arbitron market definitions for a specific area, please select a survey period and market from the list below and click the "Run Report" button.

For more information about Arbitron's market definitions, please contact David Johnston at david.johnston@arbitron.com.

Select a Survey:

Market:

[Or choose market by state](#)

Arbitron Market Definition for New York, Fall 2008

METRO DEFINITION

Fairfield (SN Split)
Essex Balance
Essex HDHA
Hudson HDBA
Middlesex Balance
Monmouth
Morris HDHA
Passaic HDHA
Union Balance
Union HDHA
Bronx HDBA
Kings Balance
Kings HDHA
Nassau HDBA
New York HDBA
Putnam
Queens HDBA
Richmond
Suffolk Central East
Suffolk Central West HDHA
Suffolk West Balance
Westchester Balance
Westchester HDHA

METRO DEFINITION

CT	Bergen	NJ
NJ	Essex HDBA	NJ
NJ	Hudson Balance	NJ
NJ	Hudson HDHA	NJ
NJ	Middlesex HDHA	NJ
NJ	Morris Balance	NJ
NJ	Passaic Balance	NJ
NJ	Somerset	NJ
NJ	Union HDBA	NJ
NJ	Bronx Balance	NY
NY	Bronx HDHA	NY
NY	Kings HDBA	NY
NY	Nassau Balance	NY
NY	New York Balance	NY
NY	New York HDHA	NY
NY	Queens Balance	NY
NY	Queens HDHA	NY
NY	Rockland	NY
NY	Suffolk Central West Balance	NY
NY	Suffolk East	NY
NY	Suffolk West HDBA	NY
NY	Westchester HDBA	NY
NY		

HDBA -- High-Density Black Area
HDHA -- High-Density Hispanic Area

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For Arbitron surveys conducted in the U.S., each Arbitron radio market is composed of up to two geographic areas: the Metro Survey Area (Metro) and the Total Survey Area (TSA).

The Metro includes one or more counties and is the primary survey area. The TSA includes all of the counties in the Metro as well as one or more non-Metro counties contiguous to the Metro area. Essentially, non-Metro TSA counties are areas where local

EXHIBIT #1A

residents can hear neighboring local radio stations.

Arbitron market definitions are relatively static. When there is a market redefinition, it is implemented in either the Spring or Fall surveys. For a full description of how Arbitron defines and updates its markets, please see our [Description of Methodology](#).

For more information on zip codes or cities, [call your Arbitron representative](#).

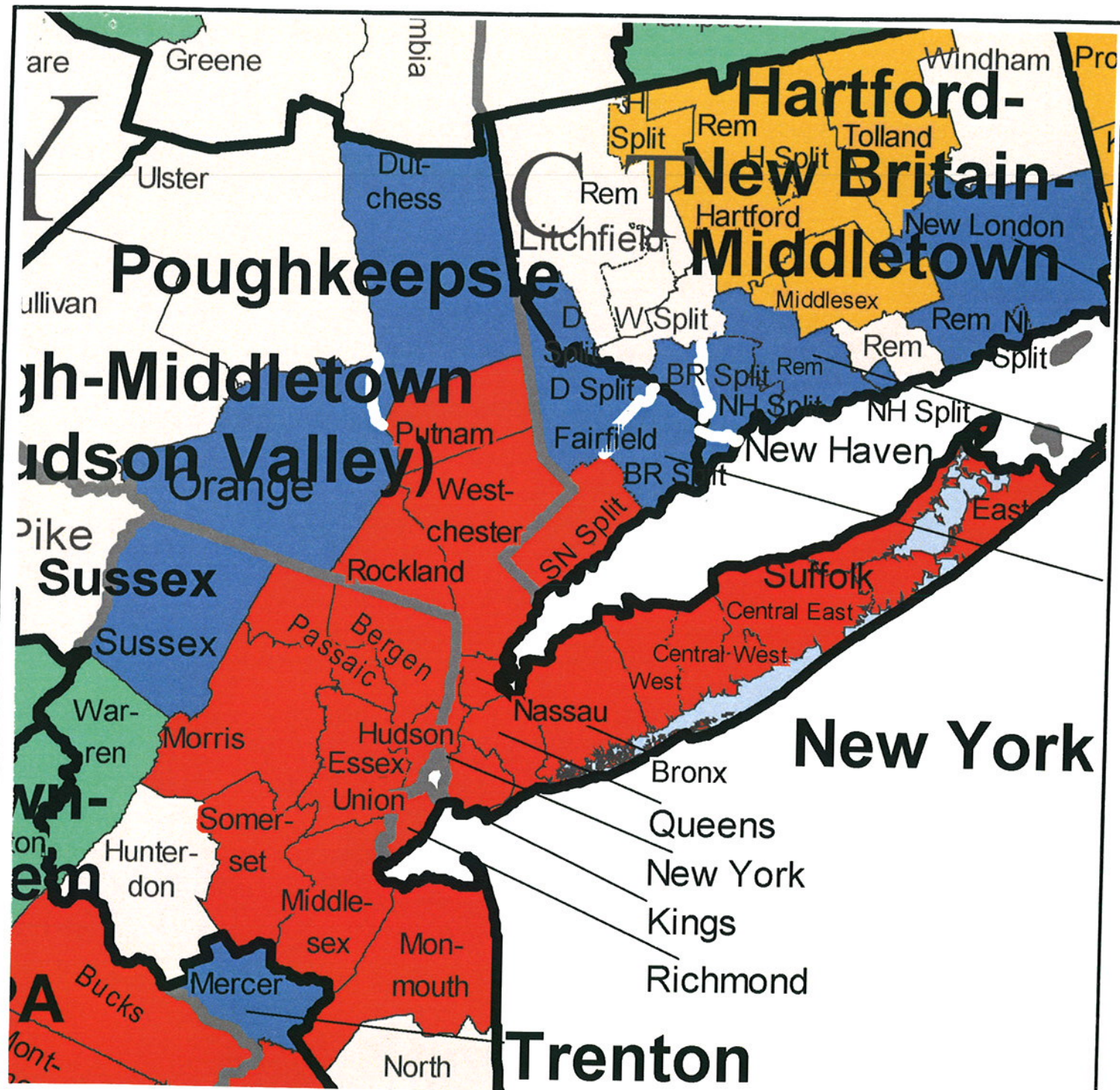


EXHIBIT #1B

2006
ARBITRON RADIO
METRO MAP

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

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Arbitron Market Definition for Danbury, CT, Fall 2008

METRO DEFINITION

Fairfield (D Split) CT

METRO DEFINITION

Litchfield (D Split) CT

TSA DEFINITION

Fairfield (D Split) CT

TSA DEFINITION

Litchfield (D Split) CT

HDDBA -- High-Density Black Area
HDDHA -- High-Density Hispanic Area

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Arbitron Market Definition for Bridgeport, Fall 2008

METRO DEFINITION

Fairfield (BR Split) Balance
Fairfield (BR Split) HDHA

CT
CT

METRO DEFINITION

Fairfield (BR Split) HDBA
New Haven (BR Split)

CT
CT

TSA DEFINITION

Fairfield (BR Split) Balance
Fairfield (BR Split) HDHA

CT
CT

TSA DEFINITION

Fairfield (BR Split) HDBA
New Haven (BR Split)

CT
CT

HDBA -- High-Density Black Area
HDHA -- High-Density Hispanic Area

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Arbitron Market Definition for Stamford-Norwalk, CT, Fall 2008

METRO DEFINITION

Fairfield (SN Split)

CT

METRO DEFINITION

TSA DEFINITION

Fairfield (SN Split)

CT

TSA DEFINITION

HDDBA -- High-Density Black Area
HDHA -- High-Density Hispanic Area

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FCC Geographic Market Definition for Danbury, CT

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WDAQ	FM	98.3	C	Hot AC	Danbury, CT	07/02/2003	197	Berkshire Broadcasting Corporation	Danbury, CT	Fairfield
WFAR	FM	93.3	NC	Ethnc/Relgn	Danbury, CT	07/02/2003	197	Danbury Community Radio Inc	Danbury, CT	Fairfield
WINE	AM	940	C	Sports	Danbury, CT	07/02/2003	197	Cumulus Broadcasting Inc	Brookfield, CT	Fairfield
WLAD	AM	800	C	FullService	Danbury, CT	07/02/2003	197	Berkshire Broadcasting Corporation	Danbury, CT	Fairfield
WREF	AM	850	C	Oldies	Danbury, CT	07/02/2003	197	Berkshire Broadcasting Corporation	Ridgefield, CT	Fairfield
WRKI	FM	95.1	C	Clsc Rock	Danbury, CT	07/02/2003	197	Cumulus Broadcasting Inc	Brookfield, CT	Fairfield
WDBY	FM	105.5	C	Hot AC	Danbury, CT	07/02/2003	197	Cumulus Broadcasting Inc	Patterson, NY	Putnam
WMNR	FM	88.1	NC	Classical	Danbury, CT	07/02/2003	197	Monroe Board of Education	Monroe, CT	Fairfield
WXCJ	FM	91.7	NC	Eclectic	Danbury, CT	07/02/2003	197	Western Connecticut State University	Danbury, CT	Fairfield

Number of Stations in Geographic Market 9

Previous Stations in Geographic Market

WPUT	AM	1510	C	Sports	New York, NY	01/20/2005	1	Cumulus Broadcasting Inc	Brewster, NY	Putnam
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

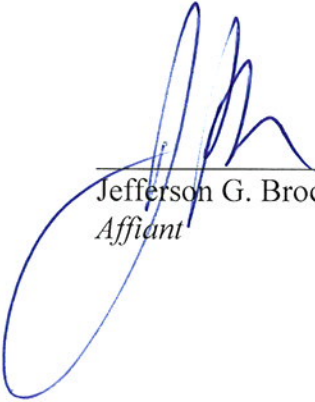
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

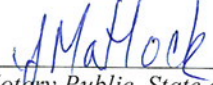
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 12th day of August 2008.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 12th day of August 2008*



Notary Public, State of Georgia
My Commission Expires: June 16, 2012